



A SeaCorridor Company

Trans Tunisian
Pipeline Company

NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA PURSUANT TO Regulation (EU) 2016/679.

Pursuant to and for the purposes of Articles 12–14 of Regulation (EU) 2016/679 (hereinafter, the “**GDPR**”), Trans Tunisian Pipeline Company S.p.A. (“**TTPC**”) and Transmed S.p.A. (“**Transmed**”), each — within the scope of its own responsibilities — as an independent Data Controller, as further detailed in paragraph 6 below, hereby provide you with the following information regarding the processing of the personal data you have provided in connection with the assignment process relating to the transportation service carried out with TTPC and/or Transmed, including the personal data processed in connection with the use of the Dicom portal and the Dashboard and Archive applications (the “**Portals**”).

1. Type of Personal Data

TTPC and Transmed, each within the scope of its own responsibilities, mainly process the following categories of personal data:

- identification and contact data of the legal representative, as well as contact details of other persons involved in the assignment process relating to the transportation service, such as, by way of example, name, surname, email address, and telephone contacts.

With regard to the processing of browsing data carried out through the Portals available on the website <https://www.ttpc.sea-corridor.com/it/servizionline>, please refer to the Privacy Policy available at the following link: <https://www.ttpc.sea-corridor.com/it/privacy-policy>.

2. Purposes and Legal Basis of the Processing

Your personal data will be processed by TTPC and Transmed, each within the scope of its own responsibilities, for the following purposes:

- a. management of the contractual relationship described above;
- b. use of the services provided through the Portals;
- c. compliance with legal obligations and with provisions issued by competent authorities.

For the purposes referred to in points a), b), and c), TTPC and Transmed, each within the scope of its own responsibilities, process personal data on the basis of their legitimate interest in performing and managing the contractual relationship described above, pursuant to Article 6(1)(f) of the GDPR, and in order to comply with legal obligations to which TTPC and Transmed are subject, pursuant to Article 6(1)(c) of the GDPR.

For the purposes described in points a), b), and c), the provision of personal data is essential and indispensable for fulfilling legal obligations and for the correct and efficient management of the contractual relationship.

3. Method of Processing

Based on the purposes indicated above, the processing of personal data is carried out by means of manual, electronic, and telematic tools designed to store, manage, and transmit such data solely for the purpose of pursuing the objectives for which they were collected, and in any case in a manner that ensures their security and confidentiality. The processing is handled by

the company functions responsible for establishing, administering, and managing the relationship, whose personnel have been appropriately trained to ensure confidentiality and to prevent the loss, destruction, unauthorized access, or unlawful processing of such data. The processing of all data provided will be carried out solely in accordance with procedures and organizational methods strictly related to the obligations, duties, or purposes described in this notice.

4. Data Retention Policy

TTPC and Transmed, each within the scope of its own responsibilities, retain within their systems the data collected in connection with the management of the contractual relationship established with TTPC and/or Transmed in a form that allows the identification of the data subjects for no longer than is necessary to achieve the purposes for which the data are processed or to comply with specific legal or contractual obligations, including those imposed by applicable civil and tax regulations.

Personal data will be retained for the entire duration of the contractual relationship in place with TTPC and/or Transmed, as well as for an additional period of 10 years following its termination. At the end of this period, the personal data will be destroyed and/or deleted by the Data Controller.

5. Categories of Entities to Whom the Data May Be Disclosed

The personal data provided will not be disseminated, meaning that they will not be made available to or accessible by unspecified parties in any form, including through mere consultation. However, they may be disclosed to specifically identified entities, in full compliance with legal requirements, for purposes strictly related to the performance of our contractual obligations.

Such entities may fall within the following categories:

- a. Companies belonging to the SeaCorridor Group or third-party companies, in connection with the performance of specific activities;
- b. Banking, financial, and insurance institutions;
- c. Companies responsible for the technical management of networks and IT systems;
- d. Entities engaged in financial risk assessment and commercial information services.

Furthermore, personal data may be made available to judicial authorities and/or law enforcement agencies upon their specific request, for the purpose of identifying the perpetrators of any unlawful acts committed against TTPC or Transmed.

Personal data are not disseminated to unspecified recipients nor transferred abroad.

A complete list of such entities or categories of entities is available at the registered offices of TTPC or Transmed, each within the scope of its own responsibilities.

6. Data Controller and Data Protection Office

The Data Controller of the personal data is the company with which the assignment process relating to the transportation service is carried out.

Trans Tunisian Pipeline Company S.p.A., with registered office at Piazza Ezio Vanoni, 1 – 20097, San Donato Milanese (MI), can be contacted at gdpr@ttpc.sea-corridor.com.

Transmed S.p.A., with registered office at via Gaspare Gozzi 1/a – 20129 Milano, can be contacted at info@transmed-spa.it.

TTPC and Transmed have appointed a Data Protection Officer (“**DPO**”), responsible for data protection, who can be contacted at groupseacorridor_dpo@pglex.it.

7. Rights Granted by Law to Data Subjects

We inform you that, pursuant to Articles 15–22 of the GDPR (EU) 2016/679, the data subject may exercise specific rights by contacting the Data Controller, including:

- a. **Right of access:** the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed and, if so, to access such data and obtain additional information on its origin, purposes, categories of data processed, recipients of communication and/or transfer of the data, etc.
- b. **Right to rectification:** the right to obtain from the Data Controller the correction of inaccurate personal data without undue delay, as well as the completion of incomplete personal data, including by providing a supplementary statement.
- c. **Right to erasure:** the right to obtain from the Data Controller the deletion of personal data without undue delay where:
 - the personal data are no longer necessary in relation to the purposes for which they were collected;
 - the consent on which the processing is based is withdrawn and there is no other legal ground for processing;
 - the personal data have been unlawfully processed;
 - the personal data must be erased to comply with a legal obligation.
- d. **Right to object to processing:** the right to object at any time to the processing of personal data based on the legitimate interest of the Data Controller.
- e. **Right to restriction of processing:** the right to obtain from the Data Controller the restriction of processing, in cases where the accuracy of the personal data is contested (for the period necessary for the Data Controller to verify the accuracy of such data), if the processing is unlawful and/or the data subject has objected to the processing.
- f. **Right to data portability:** the right to receive personal data in a structured, commonly used, and machine-readable format and to transmit such data to another Data Controller, only where the processing is based on consent and concerns data processed by electronic means.
- g. **Right to lodge a complaint with a supervisory authority:** without prejudice to any other administrative or judicial remedy, the data subject who believes that the processing concerning them violates privacy legislation has the right to lodge a complaint with the supervisory authority of the EU Member State in which they reside or normally work, or of the State in which the alleged violation occurred.

Where processing is based on consent, the data subject may withdraw consent at any time, without affecting the lawfulness of processing carried out prior to the withdrawal.

If the data subject wishes to obtain more information about the processing of their personal data or to exercise the rights described above, they may contact the Data Protection Officer by sending an email to: groupseacorridor_dpo@pglex.it.